

DOAR RIECK DeVITA KALEY & MACK

ATTORNEYS AT LAW

JOHN DOAR (1921-2014)
JOHN JACOB RIECK, JR.
JOHN F. KALEY
WALTER MACK
JAMES R. DeVITA

OF COUNSEL
JAMES I. WASSERMAN
MICHAEL MINNEFOR

ASTOR BUILDING
7TH FLOOR
217 BROADWAY
NEW YORK, N.Y. 10007-2911

TELEPHONE: (212) 619-3730
FACSIMILE: (212) 962-5037
e-mail: firm@doarlaw.com
website: www.doarlaw.com

October 16, 2017

VIA ECF

Honorable Kimba M. Wood
Senior United States District Judge
500 Pearl Street
New York, New York 10007

Re: United States v. James David Williams, et al., 16 Cr.436 (KMW)

Dear Judge Wood:

I write on behalf of defendant's Steven J. Brown and Gerald Seppala to request a Pre-trial Conference in light of the massive quantities of new discovery recently delivered or on the way to us in addition to communication from the government which characterizes the new data, including additional named individuals, as resulting from a continuing investigation with the potential of new charges.

I have communicated with legal counsel for Mr. Seppala, and they consent to such a conference.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Walter Mack', with a stylized, cursive flourish.

Walter Mack

cc: All Counsel (by ECF)